

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

tkasulis@maglaw.com  
(212) 880-9555

SENIOR COUNSEL  
PAUL R. GRAND

COUNSEL  
JASMINE JUTEAU  
CURTIS B. LEITNER

ROBERT G. MORVILLO  
1938-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

April 27, 2022

Hon. Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Rafael Martinez,  
22 Mag. 1988 (S.D.N.Y.)

**APPLICATION GRANTED**

Katharine H. Parker  
**Hon. Katharine H. Parker, U.S.M.J.**

04/27/2022

Dear Judge Parker:

We represent Rafael Martinez in the above-captioned case and seek the Court's permission for Mr. Martinez to travel on two brief trips. This application is made without objection by Pretrial Services or the government.

Mr. Martinez has been at liberty since he was arrested on February 28, 2022 and presented before Your Honor on March 1. Mr. Martinez's bond currently permits him to travel within the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Connecticut.

On May 5, Mr. Martinez seeks to travel to Chicago to help his daughter select an apartment and settle in for her university medical fellowship. He would return on May 7. On May 10, Mr. Martinez seeks to travel to Las Vegas with his family on a graduation trip for his daughter. He would return on May 11. This trip was booked and paid for months ago, and in advance of Mr. Martinez's arrest in this case.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

On April 26, we advised Mr. Martinez's Pretrial Services Officer and the assigned Assistant United States Attorney of this proposed travel, and each indicated that they had no objection to this application.

We thank the Court for its consideration of this matter.

Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON &  
ANELLO, P.C.

/s/ Telemachus P. Kasulis  
Telemachus P. Kasulis  
Elkan Abramowitz

WILLKIE FARR & GALLAGHER LLP

Michael S. Schachter  
Randall Jackson

*Counsel for Rafael Martinez*

cc: AUSA Micah Fergenson (via email)